

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

MARK W. DOBRONSKI,

Plaintiff,

Case No. 2:23-cv-10149

v.

Hon. George Caram Steeh
Magistrate Judge Curtis Ivy, Jr.

INSURANCE SUPERMARKET INC.,
a Delaware corporation; and, EMC
NATIONAL LIFE COMPANY, an Iowa
corporation,

Defendants.

Mark W. Dobronski
Plaintiff *In Pro Se*
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JACKSON LEWIS P.C.
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Attorneys for Defendants

**JACKSON LEWIS P.C.'S MOTION FOR EXTENSION OF TIME FOR
DEFENDANTS TO RETAIN NEW COUNSEL**

Jackson Lewis P.C. moves for an extension of time for Defendants Insurance Supermarket Inc. and EMC National Life Company ("Defendants") to retain new

counsel for the good cause identified below.¹ In support of its Motion, Jackson Lewis P.C. states as follows:

1. On April 11, 2024, Jackson Lewis P.C. filed its Motion to Withdraw as Counsel for Defendants Insurance Supermarket, Inc. and EMC National Life Company (“Motion to Withdraw”). (ECF No. 35)

2. On April 12, 2024, the Court entered an Order Granting Motion to Withdraw as Counsel for Defendants (ECF No. 35) and Staying Case Deadlines (“Magistrate Judge’s Order”), which granted the Motion to Withdraw and stayed case deadlines while Defendants retain new counsel. (ECF No. 36) Pursuant to the Magistrate Judge’s Order, Defendants have until May 13, 2024, to retain new counsel. (*Id.*)

3. Since the Magistrate Judge’s Order was entered, Defendants have diligently worked to retain new counsel relative to Plaintiff’s nuanced claims. However, Defendants are still working to secure new counsel.

4. Because Defendants are still working to retain new counsel, and for the good cause identified herein, Defendants respectfully request a two-week extension of time in which to retain new counsel – until May 28, 2024.

¹ Jackson Lewis P.C. files this Motion on Defendants’ behalf given that Defendants cannot appear *in pro se* to file this Motion.

5. Jackson Lewis P.C. files this Motion on Defendants' behalf as Defendants cannot appear *in pro se* to file this Motion.

6. Defendant Insurance Supermarket, Inc. is scheduled to speak with Plaintiff tomorrow, May 14, 2024, at 3:00 p.m., which will include good faith conferral on the instant Motion.

WHEREFORE, Jackson Lewis P.C. respectfully requests that Defendants be granted an extension of time in which to retain new counsel – until May 28, 2024.

Respectfully submitted,
JACKSON LEWIS P.C.

/s/Elyse K. Culberson
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Dated: May 13, 2024

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BRIEF IN SUPPORT OF JACKSON LEWIS' MOTION FOR EXTENSION
OF TIME FOR DEFENDANTS TO RETAIN NEW COUNSEL
STATEMENT OF ISSUES PRESENTED

1. Should Defendants be granted an extension of time in which to retain new counsel – until May 28, 2024, as Defendants are still diligently working to secure new counsel?

Defendants say: “Yes”

INDEX OF MOST APPROPRIATE AUTHORITY

Rule:

Fed. R. Civ. P. 16

ARGUMENT AND REQUEST FOR RELIEF

In support of its Motion, Jackson Lewis P.C. relies on the facts set forth in its Motion for Extension of Time for Defendants to Retain New Counsel.

WHEREFORE, Jackson Lewis P.C. respectfully requests that Defendants be granted an extension of time in which to retain new counsel – until May 28, 2024.

Respectfully submitted,
JACKSON LEWIS P.C.

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Attorneys for Defendants

Dated: May 13, 2024

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing instrument was served upon all parties in the above case at their respective addresses disclosed on the pleadings on May 13, 2024 by:

☐ Hand Delivery
☒ ECF

☒ U. S. Mail & E-Mail
☐ FAX

/s/Elyse K. Culberson
Elyse K. Culberson